

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	<u>INDICTMENT</u>
Plaintiff,)	
)	
-vs-)	CASE NO. _____
)	
CYRUS GHASSAB,)	
)	JUDGE _____
FARIDEH JAMALI aka JAMALI)	
FARIDEH aka FARIDEH GHASSAB,)	Title 18, Sections 2, 371,
)	513, 844(h), 844(i),
MAJEED BAZAZPOUR aka MAJEED)	924(c)(1)(A), 1001, 1341,
BAZAPOUR aka "MIKE,")	1956(a)(1)(B)(i), 1956(h),
)	1957(a), United States
JAMSHID GHASSAB aka JAMES)	Code
GHASSAB,)	
)	
MOHAMMAD FARD aka "MO,")	
)	
IRAJ NASSERI aka JERRY NASSERI)	
aka IRASI NASSERI,)	
)	
and)	
)	
FRANK TENNEY,)	
)	
Defendants.)	

COUNT 1

Conspiracy to Commit Mail Fraud

18 U.S.C. § 371

The Grand Jury charges:

1. Beginning on or about December 27, 1994, and continuing until on or about November 13, 2005, in the Northern District of

Ohio, Eastern Division, and elsewhere, CYRUS GHASSAB, FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," JAMSHID GHASSAB aka JAMES GHASSAB, MOHAMMAD FARD aka "MO," and IRAJ NASSERI aka JERRY NASSERI aka IRASI NASSERI, defendants (and hereinafter collectively referred to as "co-conspirators"), and other persons whose identities are known and unknown to the Grand Jury, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other to devise a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses and representations and for the purpose of executing such scheme and artifice, to place and cause to be placed in a post office and authorized depository for mail matter, things to be sent and delivered by the U.S. Postal Service and deposit things to be sent by any private and commercial interstate carrier, to wit: fraudulent insurance claims, correspondence, insurance proceeds paid by insurance companies in reliance on said fraudulent claims, and other items; in violation of Title 18, United States Code, Section 1341.

OBJECT OF THE CONSPIRACY

2. The object of the conspiracy was for the co-conspirators to enrich themselves by obtaining money through mailing false insurance claims and receiving payments from insurance companies on such claims through the mail.

MANNER AND MEANS OF THE CONSPIRACY

3. It was a part of the conspiracy that the coconspirators purchased and/or operated retail businesses in Mahoning and Trumbull Counties, and thereafter insured the real property and retail businesses against losses caused by fire.

4. It was a further part of the conspiracy that the coconspirators caused arson fires to occur in the insured properties and businesses and thereafter submitted claims for the losses to the insurance companies;

5. It was a further part of the conspiracy that the coconspirators concealed the fraudulent scheme to profit from the arson of the properties by making material misrepresentations to the insurance companies by using multiple insurance companies, by failing to disclose prior property loss claims when applying for insurance, by using different variations of their names, by using "straw" purchasers on the property acquisitions, by changing the names of the businesses, and by altering the addresses of the businesses to be insured;

6. It was a further part of the conspiracy that the coconspirators used the proceeds of the insurance claims to provide down payments for personal residences in the United States and in Iran, to obtain cash for traveling to and relocating to Iran, to reinvest in other properties and businesses, to divert assets from the United States to other

countries, to compensate other members of the conspiracy, to further perpetuate the viability of the conspiracy, and to provide \$100,000 in bail money towards the release bond of coconspirator JAMSHID GHASSAB from federal custody on a pending felony case.

7. It was a further part of the conspiracy that in response to questions from insurance companies, insurance investigators, fire officials, and local and federal law enforcement officers regarding possible individuals who could be responsible for the arson fires, that the co-conspirators consistently named a business competitor as the likely perpetrator of the arson fires so as to misdirect investigative efforts and to avoid detection of the criminal conspiracy and its members.

OVERT ACTS

8. In furtherance of the conspiracy and to effect its object, the following overt acts, among others, were committed in the Northern District of Ohio and elsewhere:

_____a. On December 27, 1994, JAMSHID GHASSAB submitted an application for insurance on a commercial building located at 901 Glenwood Ave., Youngstown, Ohio, with American Economy Insurance Company. _____

_____b. On approximately February 15, 1996, a check in the amount of \$158,750.00 was mailed to JAMSHID GHASSAB in Mahoning

County for a property loss claim made on the business located at 901 Glenwood Ave., Youngstown, Ohio.

c. On February 10, 1997, IRAJ NASSERI and FARIDEH JAMALI purchased commercial property located at 2606 Glenwood Ave., Youngstown, Ohio.

d. On June 19, 1997, IRAJ NASSERI secured insurance for commercial property located at 2606 Glenwood Ave., Youngstown, Ohio.

e. On April 23, 1998, Scottsdale Insurance Company mailed a letter to CYRUS GHASSAB and Crestview Inc., 1920 McCartney Rd., Youngstown, Ohio.

f. On September 29, 1998, IRAJ NASSERI and CYRUS GHASSAB caused Alex N. Sill Company to send by U.P.S. repair estimates on the Valley Bar to Mark Noe Insurance Adjusting Group, 7601 Mentor Ave., Suite 101, Mentor, Ohio 44060.

g. On June 25, 1999, CYRUS GHASSAB obtained insurance from Central Mutual Insurance Companies and put it in the name of Gina's Food and Drive Thru and Gina's Boutique located at 608-1/2 North Garland, Youngstown, Ohio.

h. On August 1, 1999, CYRUS GHASSAB and MAJEED BAZAZPOUR signed a lease agreement between themselves for Gina's Beauty Supplies, located in Youngstown, Ohio.

i. On November 1, 1999, FAREDEH JAMALI applied for insurance with Insurance Center of Warren (Northwestern National) on property located at 55 South Leavitt, Leavittsburg, Ohio.

j. On December 21, 1999, a check in the amount of \$11,059.49 made payable to IRAJ NASSERI (using the spelling "Iraj Naasseri" on the letter) and other parties was mailed to an address in Youngstown, Ohio, from an address in Cleveland, Ohio, representing a partial settlement from an insurance claim related to an arson fire which occurred in 1998 at property located at 2606 Glenwood Avenue, Youngstown, Ohio.

k. On October 4, 2001, insurance was obtained for JB's Foods by MAJEED BAZAZPOUR in conjunction with FARIDEH GHASSAB with an effective date of October 5, 2001.

l. On February 22, 2002, Central Mutual Insurance Company issued a check in the amount of \$100,000 made payable to the "U. S. Clerk of District Court" located in the Northern District of Ohio, from insurance proceeds, which payment benefitted both CYRUS GHASSAB and JAMSHID GHASSAB.

m. On March 5, 2002, the United States District Court for the Northern District of Ohio received \$100,000 from Central Mutual Insurance Company for deposit with the Clerk's Office in United States v. Jamshid Ghassab, Case No. 4:99CR00048.

n. On or immediately after May 12, 2004, a sworn proof of loss, completed by MAJEED BAZAZPOUR (using the spelling "MAJEED BAZAPOUR"), was mailed to Harleysville Insurance Company related to an arson fire which occurred in 2004 at property located at 2604 Glenwood Avenue, Youngstown, Ohio.

o. Between November 22, 2004, and January 3, 2005, Harleysville Insurance Company of Ohio mailed a check in the amount of \$421,062 made payable to MAJEED BAZAZPOUR, FARIDEH JAMALI, and another individual known to the grand jury to an address in Mahoning County, Ohio, on a claim related to an arson fire which occurred in 2004 at property located at 2604 Glenwood Avenue, Youngstown, Ohio.

p. On February 4, 2005, MOHAMMAD FARD aka "MO" caused the deposit of an official check in the amount of \$25,000.00, into account number xxxxxx4931 in the name "MOHAMMAD FARD" at Sky Bank, now known as Huntington National Bank.

q. On March 3, 2005, MAJEED BAZAZPOUR applied for and received insurance on Mike's Beauty Supply from State Farm Fire and Casualty Company, in Mahoning County.

r. On April 12, 2005, a \$65,000 check payable to JAMALI FERIDEH, CYRUS GHASSAB, IRASI NASSERI, Crestview Inc. and another individual known to the Grand Jury was issued by

Scottsdale Insurance Company, related to an insurance claim related to an arson fire which occurred in 2004 at property located at 2604 Glenwood Avenue, Youngstown, Ohio.

s. On April 28, 2005, the Mahoning County Court of Common Pleas mailed a judgment entry to FARIDEH JAMALI (addressed on the docket as "Ferideh, Jamali") and other parties at an address in Mahoning County, Ohio.

t. On September 7, 2005, a check was issued by a person known to the grand jury in the amount of \$50,000 made payable to FARIDEH JAMALI.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

Conspiracy to Commit Arson of an Interstate Building

18 U.S.C. § 371

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1 (with the exception of the allegations contained in paragraphs 1 and 2 of Count 1) of the Indictment as if fully rewritten herein;

2. Beginning on or about September 2, 1995, and continuing until on or about November 13, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere,

CYRUS GHASSAB, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," and FRANK TENNEY, defendants (and hereinafter collectively referred to as "co-conspirators"), Earl Adams (not charged in this indictment) and other persons whose identities are known and unknown to the Grand Jury, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other

a. to knowingly use fire to damage and destroy and attempt to damage and destroy real property to facilitate the commission of mail fraud in violation of Title 18, Section 1341, United States Code, a felony prosecutable in a court of the United States, in violation of Title 18, Section 844(h), United States Code, and

b. to maliciously damage and destroy and attempt to damage and destroy by means of fire buildings used in interstate commerce, in violation of Title 18, Section 844(i), United States Code.

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was for the co-conspirators to intentionally set fires and to hire others to intentionally set fires at properties owned, managed, or controlled by the co-conspirators, thereafter enriching themselves by defrauding insurance companies by filing false claims related to losses resulting from damage caused by the

intentionally set fires.

MANNER AND MEANS OF THE CONSPIRACY

4. It was a part of the conspiracy that CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," personally set or caused other individuals to intentionally set fires at properties owned or operated by them which had been insured against loss by fire.

5. It was a part of the conspiracy that CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," solicited others, including FRANK TENNEY and Earl Adams (not charged in this indictment) to set fires, offering cash and other compensation.

6. It was a part of the conspiracy that CYRUS GHASSAB offered instructions to others on how to set arson fires.

7. It was a part of the conspiracy that CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR set fires and caused fires to be set in order to engage in an insurance fraud scheme by which they profited by collecting insurance proceeds on claims made by them or on their behalf by others known to the Grand Jury.

8. It was a further part of the conspiracy that in response to questions from insurance companies, insurance investigators, fire officials, and local and federal law enforcement officers regarding possible individuals who

could be responsible for the arson fires, that the co-conspirators consistently named a business competitor as the likely perpetrator of the arson fires so as to misdirect investigative efforts and to avoid detection of the criminal conspiracy and its members.

OVERT ACTS

9. In furtherance of the conspiracy and to effect its object thereof, the following overt acts, among others, were committed in the Northern District of Ohio and elsewhere:

a. On September 2, 1995, CYRUS GHASSAB set fire to a commercial building located at 901 Glenwood Ave., Youngstown, Ohio.

b. On April 20, 1998, CYRUS GHASSAB and MAJEED BAZAZPOUR set fire to a commercial building located at 2606 Glenwood Ave., Youngstown, Ohio.

c. On December 11, 1999, CYRUS GHASSAB and MAJEED BAZAZPOUR set fire to a commercial building located at 608 North Garland, Youngstown, Ohio.

d. On April 22, 2004, CYRUS GHASSAB and MAJEED BAZAZPOUR set fire to a commercial building located at 2604/2606 Glenwood Ave., Youngstown, Ohio.

e. On April 18, 2005, a representative of MAJEED BAZAZPOUR met with the owners of Party Pantry.

f. On June 24, 2005, MAJEED BAZAZPOUR set fire to a commercial building located at 2732 Glenwood Ave., Youngstown, Ohio by use of two molotov cocktails.

g. On July 21, 2005, Earl Adams (not charged in this indictment) attempted to set fire to a commercial building located at 55 South Leavitt, Leavittsburg, Ohio, by throwing a molotov cocktail destructive device through the glass front door of Young's Market.

h. On July 25, 2005, Earl Adams (not charged in this indictment) set a rug on fire using an accelerant in the rear of a commercial building located at 55 South Leavitt, Leavittsburg, Ohio.

i. On August 8, 2005, Earl Adams (not charged in this indictment) set a fire inside of Young's Market located at 55 South Leavitt, Leavittsburg, Ohio.

j. On or about November 6, 2005, CYRUS GHASSAB and FRANK TENNEY had a conversation.

k. Between November 6, 2005, and November 13, 2005, FRANK TENNEY placed furniture he had obtained from CYRUS GHASSAB into FRANK TENNEY'S apartment at 55 South Leavitt, Apartment 6, Leavittsburg, Ohio.

l. On November 13, 2005, CYRUS GHASSAB and FRANK TENNEY had a conversation.

m. On November 13, 2005, CYRUS GHASSAB attempted to set a fire by means of a destructive device to a commercial building located at 55 South Leavitt, Leavittsburg, Ohio.

All in violation of Title 18, Section 371, United States Code.

COUNT 3

Conspiracy to Commit Money Laundering

18 U.S.C. § 1956(h)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1 (with the exception of the allegations contained in paragraphs 1 and 2 of Count 1) of the Indictment as if fully rewritten herein;

2. Beginning on or about December 11, 1999, and continuing until on or about March 22, 2005, within the Northern District of Ohio, Eastern Division, and elsewhere, CYRUS GHASSAB, FARIDEH JAMALI, aka JAMALI FARIDEH, aka FARIDEH GHASSAB, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," JAMSHID GHASSAB aka JAMES GHASSAB, and MOHAMMAD FARD aka "MO," defendants, and other persons whose identities are known and unknown to the Grand Jury (and hereinafter collectively referred to as "co-conspirators"), did

willfully, and unlawfully combine, conspire, confederate, and agree together and with each other

(a) to conduct and attempt to conduct financial transactions involving property that represented the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to knowingly engage and attempt to engage, in the United States, in monetary transactions affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957(a).

3. For the purpose of the preceding paragraph, the specified unlawful activity consisted of mail fraud, in violation of Title 18, United States Code, Section 1341.

4. The objects of the conspiracy were to:

(a) convert the proceeds of mail fraud into cash and to conceal it within bank accounts and elsewhere so that the mail fraud would not be detected; and

(b) convert unlawfully obtained proceeds of mail fraud into amounts of money greater than \$10,000 that the co-conspirators could use for any purpose.

MANNER AND MEANS

5. Defendants employed the following manner and means to attain the objectives of the conspiracy:

(a) During the time period referred to in paragraph 2 of this count, the co-conspirators fraudulently obtained payments from insurance companies through the mail, as compensation for claimed losses occasioned by intentionally set fires which had occurred at various real properties and businesses located in Mahoning and Trumbull counties owned and managed by the co-conspirators.

(b) During the time period referred to in paragraph 2 of this count, the co-conspirators disbursed the proceeds to other co-conspirators to compensate them for their roles in the mail fraud conspiracy;

(c) Defendants engaged in a series of financial transactions with financial institutions consisting of deposits of insurance checks and the subsequent disbursements and transfers of the proceeds.

(d) During the time period referred to in paragraph 2 of this count, the co-conspirators laundered at least \$695,112 of unlawfully obtained proceeds, through various business and personal bank accounts.

OVERT ACTS

6. In furtherance of the conspiracy and to effect its objects, the following overt acts, among others, were committed in the Northern District of Ohio and elsewhere:

a. On February 22, 2002, JAMSHID GHASSAB aka JAMES GHASSAB and CYRUS GHASSAB caused the Central Mutual Insurance Company to issue a check in the amount of \$100,000 payable to and deposited with the Clerk of the United States District Court, in the Northern District of Ohio;

b. On September 11, 2002, CYRUS GHASSAB endorsed an insurance check and deposited \$144,175.60 in insurance proceeds into a business account with National City Bank;

c. On October 16, 2002, CYRUS GHASSAB wrote a check, No. 2128, in the amount of \$22,000 to National City Bank;

d. On October 28, 2002, CYRUS GHASSAB wrote check No. 2129 in the amount of \$115,000 payable to cash which was then deposited by him into Home Savings and Loan Company;

e. On January 3, 2005, FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB caused the deposit of insurance proceeds from Harleysville Insurance Company of Ohio in the amount of \$421,062 into an account at Sky Bank located in Youngstown, Ohio;

f. On January 12, 2005, CYRUS GHASSAB caused a transfer of \$37,444.97 in repayment of a loan at Skybank;

g. On January 14, 2005, CYRUS GHASSAB purchased an official check at Skybank made payable to MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE" in the amount of \$54,000.

h. On February 4, 2005, CYRUS GHASSAB purchased an official check at Skybank made payable to First Place Bank in the amount of \$20,000.

i. On February 4, 2005, CYRUS GHASSAB purchased an official check at Skybank made payable to MOHAMMAD FARD aka "MO" in the amount of \$25,000.

j. On March 18, 2005, CYRUS GHASSAB purchased an official check at Skybank made payable to CYRUS GHASSAB in the amount of \$15,000.

k. On March 18, 2005, CYRUS GHASSAB transferred \$230,000 to Skybank Savings Account Number xxxxxx4832.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 4

Aiding and Abetting Arson in Commission of a Felony

18 U.S.C. §§ 844(h) and 2

The Grand Jury further charges:

On or about April 20, 1998, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," did knowingly use fire to commit conspiracy to commit mail fraud as more fully set forth in Count 1 of the Indictment, incorporated herein by reference, in violation of Title 18, Sections 371 and 1341, United States Code, a felony prosecutable in a court of the United States, to wit, CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," damaged by fire a commercial building located at 2606 Glenwood Ave., Youngstown, Ohio; in violation of Title 18, Sections 844(h) and 2, United States Code.

COUNT 5

Aiding and Abetting Arson in Commission of a Felony

18 U.S.C. §§ 844(h) and 2

The Grand Jury further charges:

On or about December 11, 1999, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB and MAJEED

BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," did knowingly use fire to commit conspiracy to commit mail fraud as more fully set forth in Count 1 of the Indictment, incorporated herein by reference, in violation of Title 18, Sections 371 and 1341, United States Code, a felony prosecutable in a court of the United States, to wit, CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," damaged by fire and destroyed a commercial building located at 608 and 608-1/2 North Garland Ave., Youngstown, Ohio; in violation of Title 18, Sections 844(h) and 2, United States Code.

COUNT 6

Aiding and Abetting Arson in Commission of a Felony

18 U.S.C. §§ 844(h) and 2

The Grand Jury further charges:

On or about April 22, 2004, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," did knowingly use fire to commit conspiracy to commit mail fraud as more fully set forth in Count 1 of the Indictment, incorporated herein by reference, in violation of Title 18, Sections 371 and 1341, United States Code, a felony prosecutable in a court of the United States, to wit, CYRUS GHASSAB and MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," damaged by fire and

destroyed a commercial building located at 2604 and 2606 Glenwood Ave., Youngstown, Ohio; in violation of Title 18, Sections 844(h) and 2, United States Code.

COUNT 7

Aiding and Abetting Arson

18 U.S.C. §§ 844(i) and 2

The Grand Jury further charges:

On or about June 24, 2005, in the Northern District of Ohio, Eastern Division, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE" did maliciously damage by means of fire a building used in interstate commerce, to wit, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," damaged a commercial building located at 2732 Glenwood Ave., Youngstown, Ohio, by throwing a molotov cocktail through the exhaust vent located on the roof of the building; in violation of Title 18, Sections 844(i) and 2, United States Code.

COUNT 8

Aiding and Abetting Attempted Arson

18 U.S.C. §§ 844(i) and 2

The Grand Jury further charges:

On or about July 21, 2005, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB and Earl Adams (not charged in this Indictment) did maliciously attempt to damage and destroy by means of fire a building used in interstate commerce, to wit, CYRUS GHASSAB and Earl Adams (not charged in this Indictment) attempted to burn a commercial building located at 55 South Leavitt, Leavittsburg, Ohio by throwing a molotov cocktail through the front glass door of Young's Market located on the first floor of the building; in violation of Title 18, Sections 844(i) and 2, United States Code.

COUNT 9

Aiding and Abetting Attempted Arson

18 U.S.C. §§ 844(i) and 2

The Grand Jury further charges:

On or about July 25, 2005, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB and Earl Adams (not charged in this Indictment) did maliciously attempt to damage and destroy by means of fire a building used in

interstate commerce, to wit, CYRUS GHASSAB and Earl Adams (not charged in this Indictment) attempted to burn a commercial building located at 55 South Leavitt, Leavittsburg, Ohio; in violation of Title 18, Sections 844(i) and 2, United States Code.

COUNT 10

Aiding and Abetting Attempted Arson

18 U.S.C. §§ 844(i) and 2

The Grand Jury further charges:

On or about August 8, 2005, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB and Earl Adams (not charged in this Indictment) did maliciously attempt to damage and destroy by means of fire a building used in interstate commerce, to wit, CYRUS GHASSAB and Earl Adams (not charged in this Indictment) attempted to burn a commercial building located at 55 South Leavitt, Leavittsburg, Ohio; in violation of Title 18, Sections 844(i) and 2, United States Code.

COUNT 11

Aiding and Abetting Attempted Arson

18 U.S.C. §§ 844(i) and 2

The Grand Jury further charges:

On or about November 13, 2005, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB and FRANK TENNEY did maliciously attempt to damage and destroy by means of fire and an explosive a building used in interstate commerce, to wit, CYRUS GHASSAB and FRANK TENNEY attempted to burn a commercial building located at 55 South Leavitt, Leavittsburg, Ohio by using an improvised incendiary destructive device; in violation of Title 18, Sections 844(i) and 2, United States Code.

COUNT 12

Aiding and Abetting Mail Fraud

18 U.S.C. §§ 1341 and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1 (with the exception of the allegations contained in paragraph 1 of Count 1) of the Indictment as if fully rewritten herein.

2. On or about April 28, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, CYRUS

GHASSAB, FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB, and IRAJ NASSERI aka JERRY NASSERI aka IRASI NASSERI, having devised a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses and representations, to wit: CYRUS GHASSAB, FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB, and IRAJ NASSERI aka JERRY NASSERI aka IRASI NASSERI, having reported a loss to the Scottsdale Insurance Company from a fire at 2606 Glenwood, Youngstown, Ohio, knowing the fire to have been intentionally set for the profit of the owners and operators of the business property, and for the purpose of executing such scheme and artifice, did cause to be placed in a post office and authorized depository for mail matter things to be sent and delivered by the U.S. Postal Service, to wit: a judgment entry mailed from the Mahoning County Court of Common Pleas addressed to FARIDEH JAMALI (using the name "Ferideh, Jamali") in care of her attorney, at 1040 South Commons #200, Youngstown, Ohio 44514; all in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT 13

Aiding and Abetting Mail Fraud

18 U.S.C. §§ 1341 and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1 (with the exception of the allegations contained in paragraph 1 of Count 1) of the Indictment as if fully rewritten herein.

2. On or about May 12, 2004, in the Northern District of Ohio, Eastern Division, and elsewhere, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB, and IRAJ NASSERI aka JERRY NASSERI aka IRASI NASSERI, having devised a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses and representations, to wit: MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE," on behalf of FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB, IRAJ NASSERI aka JERRY NASSERI aka IRASI NASSERI, and himself, reported a loss to the Harleysville Insurance Company from a fire at 2604 Glenwood, Youngstown, Ohio, knowing the fire to have been intentionally set for the profit of the owners and operators of the business property, and for the purpose of executing such scheme and artifice, did place and cause to be placed in a post office and authorized depository for

mail matter things to be sent and delivered by the U.S. Postal Service, to wit: a "sworn statement in proof of loss" addressed to Harleysville Insurance Company; all in violation of Title 18, United States Code, Sections 1341 and 2.

Count 14

Aiding and Abetting Money Laundering

18 U.S.C. §§ 1957(a) and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 3 (with the exception of the allegations contained in paragraph 2 of Count 3) of the Indictment as if fully rewritten herein.

2. On or about January 3, 2005, in the Northern District of Ohio, Eastern Division, FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000.00, that is, FARIDEH JAMALI aka JAMALI FARIDEH aka FARIDEH GHASSAB caused the deposit of a check drawn on the account of Harleysville Insurance Company of Ohio, in the amount of \$421,062.00, into account number xxxxxx5783 in the name "FARIDEH JAMALI or CYRUS GHASSAB" at

Sky Bank, now known as Huntington National Bank, located in Youngstown, Ohio, such property having been derived from a specified unlawful activity, that is, mail fraud in violation of Title 18, United States Code, Section 1341; all in violation of Title 18, United States Code, Sections 1957(a) and 2.

Count 15

Aiding and Abetting Money Laundering

18 U.S.C. §§ 1957(a) and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 3 (with the exception of the allegations contained in paragraph 2 of Count 3) of the Indictment as if fully rewritten herein.

2. On or about January 14, 2005, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000.00, that is, CYRUS GHASSAB purchased an Official Check payable to "MAJEED BAZAZPOUR" at Sky Bank, now known as Huntington National Bank, located in Youngstown, Ohio, in the amount of \$54,000.00, such property having been derived from a

specified unlawful activity, that is, mail fraud in violation of Title 18, United States Code, Section 1341; all in violation of Title 18, United States Code, Sections 1957(a) and 2.

Count 16

Aiding and Abetting Money Laundering

18 U.S.C. §§ 1957(a) and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 3 (with the exception of the allegations contained in paragraph 2 of Count 3) of the Indictment as if fully rewritten herein.

2. On or about January 14, 2005, in the Northern District of Ohio, Eastern Division, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE", did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000.00, that is, MAJEED BAZAZPOUR aka MAJEED BAZAPOUR aka "MIKE" caused the deposit of an official check drawn on the account of Sky Bank, now known as Huntington National Bank, located in Youngstown, Ohio, in the amount of \$54,000.00, into account number xxxxxx9670 in the name "MAJEED BAZAZPOUR" at Home Savings & Loan Company, such

property having been derived from a specified unlawful activity, that is, mail fraud in violation of Title 18, United States Code, Section 1341; all in violation of Title 18, United States Code, Sections 1957(a) and 2.

Count 17

Aiding and Abetting Money Laundering

18 U.S.C. §§ 1957(a) and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 3 (with the exception of the allegations contained in paragraph 2 of Count 3) of the Indictment as if fully rewritten herein.

2. On or about February 4, 2005, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000.00, that is, CYRUS GHASSAB purchased an Official Check payable to "MOHAMMAD FARD" at Sky Bank, now known as Huntington National Bank, located in Youngstown, Ohio, in the amount of \$25,000.00, such property having been derived from a specified unlawful activity, that is, mail fraud in violation of Title 18, United States Code, Section 1341; all

in violation of Title 18, United States Code, Sections 1957(a) and 2.

Count 18

Aiding and Abetting Money Laundering

18 U.S.C. §§ 1957(a) and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 3 (with the exception of the allegations contained in paragraph 2 of Count 3) of the Indictment as if fully rewritten herein.

2. On or about February 4, 2005, in the Northern District of Ohio, Eastern Division, MOHAMMAD FARD aka "MO", did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000.00, that is, MOHAMMAD FARD aka "MO" caused the deposit of an official check drawn on the account of Sky Bank, now known as Huntington National Bank, located in Youngstown, Ohio, in the amount of \$25,000.00, into account number xxxxxx4931 in the name "MOHAMMAD FARD" at Sky Bank, now known as Huntington National Bank, such property having been derived from a specified unlawful activity, that is, mail fraud in violation of Title 18, United States Code, Section 1341; all

in violation of Title 18, United States Code, Sections 1957(a) and 2.

Count 19

Aiding and Abetting Possession of a Forged Security

18 U.S.C. §§ 513 and 2

The Grand Jury further charges:

On or about June 30, 2006, in the Northern District of Ohio, Eastern Division, MOHAMMAD FARD aka "MO", with intent to deceive another person and organization, that is, Citi Bank and Sky Bank (now known as Huntington National Bank), knowingly made, uttered, and possessed a falsely endorsed security of an organization operating in and affecting interstate commerce, that is, a check containing forged endorsements of "FARIDEH JAMALI" and "CYRUS GHASSAB" issued by Liberty Mutual Insurance from a business account at Citi Bank, in the amount of \$9,058.28, which check was subsequently deposited into account number xxxxxx9148 in the name "Mighty Moe's Sports Restaurant" at Sky Bank (now known as Huntington National Bank and located in Youngstown, Ohio); all in violation of Title 18, United States Code, Sections 513 and 2.

Count 20**Making False Statement****18 U.S.C. § 1001**

The Grand Jury further charges:

On or about February 7, 2008, in the Northern District of Ohio, Eastern Division, the Defendant, MOHAMMAD FARD aka "MO", did willfully and knowingly make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of an agency of the United States knowing the same to contain a materially false, fictitious and fraudulent statement, to wit: MOHAMMAD FARD aka "MO" verbally stated to a special agent and an auditor of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, that he had "no" business dealings with Cyrus Ghassab and "zero" business interests with Cyrus Ghassab, when in truth and fact, as he then well knew, MOHAMMAD FARD aka "MO" had assisted Cyrus Ghassab with collecting monies from business associates of Cyrus Ghassab, owned a real property in which Cyrus Ghassab had a business located, had received an insurance payment on Cyrus Ghassab's behalf, had bought Cyrus Ghassab's personal home and one business after Cyrus Ghassab left the United States, and had employed Cyrus Ghassab's wife at his restaurant; in violation of Title 18, Section 1001, United States Code.

Count 21Use of Destructive Device in Committing a Violent Felony18 U.S.C. § 924(c) (1) (A)

The Grand Jury further charges:

On or about November 13, 2005, in the Northern District of Ohio, Eastern Division, CYRUS GHASSAB, during and in relation to a crime of violence for which he may be prosecuted in the United States District Court, that is arson in violation of Title 18, Section 844(i), United States Code, did knowingly use and carry a firearm and destructive device, to wit, an improvised incendiary weapon which is a destructive device as defined in Title 26, Section 5845(f) (1) (F); in violation of Title 18, Section 924(c) (1) (A), United States Code and punishable under Title 18, Section 924(c) (1) (B) (ii), United States Code.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

UNITED STATES v. CYRUS GHASSAB, ET AL.

A TRUE BILL.

Foreperson

WILLIAM J. EDWARDS
Acting United States Attorney

 UNITED STATES V. CYRUS GHASSAB, ET AL--April 9, 2008

CT	Defendants	Charge	Penalty
1	CG FJ MB JG MF IN	Conspiracy to Commit Mail Fraud 18 U.S.C. § 371	5 yrs
2	CG MB FT	Conspiracy to Commit Arson 18 U.S.C. § 371	5 yrs
3	CG FJ MB JG MF	Conspiracy to Commit Money Laundering 18 U.S.C. § 844(h)and 2	20 yrs/500K or 2x
4	CG MB	Aiding and Abetting Arson in Commission of a Felony, 18 U.S.C. §§ 844(h)and 2	20 yrs CM
5	CG MB	Aiding and Abetting Arson in Commission of a Felony, 18 U.S.C. §§ 844(h)and 2	20 yrs CM
6	CG MB	Aiding and Abetting Arson in Commission of a Felony, 18 U.S.C. §§ 844(h)and 2	20 yrs CM
7	MB	Aiding and Abetting Arson 18 U.S.C. §§ 844(i)and 2	5 to 10 yrs
8	CG	Aiding and Abetting Attempted Arson 18 U.S.C. §§ 844(i)and 2	5 to 10 yrs
9	CG	Aiding and Abetting Attempted Arson 18 U.S.C. §§ 844(i)and 2	7 to 40 yrs
10	CG	Aiding and Abetting Attempted Arson 18 U.S.C. §§ 844(i)and 2	5 to 10 yrs
11	CG FT	Aiding and Abetting Attempted Arson 18 U.S.C. §§ 844(i)and 2	5 to 10 yrs

UNITED STATES V. CYRUS GHASSAB, ET AL--Continued

CT	Defendants	Charge	Penalty
12	CG FJ IN	Aiding and Abetting Mail Fraud 18 U.S.C. §§ 1957(a) and 2	20 yrs
13	MB FJ IN	Aiding and Abetting Mail Fraud 18 U.S.C. §§ 1957(a) and 2	20 yrs
14	FJ	Aiding and Abetting Money Laundering 18 U.S.C. §§ 1957(a) and 2	10 yrs/2x
15	CG	Aiding and Abetting Money Laundering 18 U.S.C. §§ 1957(a) and 2	10 yrs/2x
16	MB	Aiding and Abetting Money Laundering 18 U.S.C. §§ 1957(a) and 2	10 yrs/2x
17	CG	Aiding and Abetting Money Laundering 18 U.S.C. §§ 1957(a) and 2	10 yrs/2x
18	MF	Aiding and Abetting Money Laundering 18 U.S.C. §§ 1957(a) and 2	10 yrs/2x
19	MF	Aiding and Abetting Posses- sion of a Forged Security 18 U.S.C. §§ 513 and 2	10 yrs
20	MF	Making False Statement 18 U.S.C. § 1001	5 yrs
21	CG	Use of a Destructive Device in the Commission of a Violent Felony 18 U.S.C. § 924(c) (1) (A)	30 yr CM